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6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8 UNITED STATES OF AMERICA,)
9 v.) **STIPULATION FOR**
10 JOHN KANE,) **PROTECTIVE ORDER**

11 _____)
12 IT IS HEREBY STIPULATED AND AGREED between the parties, Daniel Bogden,
13 United States Attorney for the District of Nevada, and Michael Chu, Assistant United States
14 Attorney, counsel for the United States, and Andrew Leavitt, counsel for defendant John Kane that
15 this Court issue an Order protecting from disclosure to the public any discovery documents
16 containing the personal identifying information such as account numbers, social security numbers,
17 drivers license numbers, dates of birth, phone numbers, Email addresses or physical addresses, of
18 participants, witnesses and victims in this case. Such documents shall be referred to hereinafter as
19 “Protected Documents.” The parties state as follows:

20 1. Protected Documents which may be used by the parties include personal identifiers
21 such as account numbers, social security numbers, drivers license numbers, dates of birth, phone
22 numbers, Email addresses or physical addresses of participants, witnesses, and victims in this
23 case.

24 2. Many of these documents include personal identifiers which may constitute
25 evidence in this case.
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1 3. The United States agrees to provide Protected Documents to Defendant without
2 redacting the personal identifiers of participants, witnesses, and victims, with the possible
3 exception of 302 reports that it reserves the right to produce in redacted form.

4 4. Access to Protected Documents will be restricted to personnel authorized by the
5 Court, namely defendant, attorneys of record and attorneys, paralegals, investigators, experts, and
6 secretaries employed by the attorneys of record and performing services on behalf of defendant.

7 5. The following restrictions will be placed on defendant, defendant's attorney and the
8 above-designated individuals unless further ordered by the Court. Defendant, defendant's
9 attorney and the above-designated individuals shall not:

- 10 a. make copies for, or allow copies of any kind to be made by any other
11 person of Protected Documents, or allow the Protected Documents to be otherwise disseminated;
12 b. allow any other person to read Protected Documents; and
13 c. use Protected Documents for any other purpose other than preparing to
14 defend against the charges in the Indictment or any further superseding indictment arising out of
15 this case.

16 6. Defendant's attorney shall inform any person to whom disclosure may be made
17 pursuant to this order of the existence and terms of this Court's order.

18 7. The requested restrictions shall not restrict the use or introduction as evidence of
19 discovery documents containing personal identifiers such as account numbers, social security
20 numbers, drivers license numbers, dates of birth, phone numbers, Email addresses or physical
21 addresses during the trial of this matter.

22 8. Upon conclusion of this litigation, Defendant's attorney shall return to counsel for
23 the United States, or destroy and certify to counsel for the United States, the destruction of all
24 discovery documents containing personal identifiers such as account numbers, social security

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1 numbers, drivers license numbers, dates of birth, phone numbers, Email addresses or physical
2 addresses within a reasonable time, not to exceed thirty days after defendant has exhausted all
3 appellate rights.

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5 DANIEL BOGDEN
United States Attorney

6 /s/

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8 MICHAEL CHU
Assistant U.S. Attorney

9 /s/

10 ANDREW LEAVITT
Counsel for defendant

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12 **ORDER**

13 IT IS SO ORDERED this _____ day of February 2011.
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16 _____
UNITED STATES DISTRICT JUDGE
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